

REMARKS

Claims 1-13 and 15-24 and 26-28 were pending in the application. Applicant has amended claims 1-3, 5, 10, and 15, and canceled claims 4, 6, 7, 9, 11, and 18-28 from further consideration in this application. Applicant respectfully requests reconsideration in light of the amendments and the following remarks.

CLAIM REJECTIONS UNDER 35 USC §103

The Office Action finally rejected claims 1-13, and 15-22 under 35 USC 103(a) as being anticipated by *Keller* et al. (US Publication 2003/0050849A1) in view of *Jani* et al. (US Publication 2005/0049974 A1).

Applicant traverses this finding of obviousness. *Keller's* method does not select whether to perform a data transformation at the local node or a central node, depending on local conditions. The Office Action conceded this point. However, the Office Action erroneously states that *Jani's* payment processing intermediary addresses this deficiency in *Keller*. As stated previously, *Jani* does not teach or suggest deciding where to transform data depending on local conditions. Not only does *Jani* not transform data, it does not make a decision as to where to send the data to be transformed. In paragraphs [0043] and [0044] of *Jani* it is clear that the intermediary processor processes the data through one of its worker threads, one worker thread per processor object. The decision *Jani* makes is limited to sending the processing request to a queue if no worker threads (Payment Processors 322₁ through 322_n) are available, as stated in

paragraph [0045] and in step 212 of FIG. 7A. As shown in FIG. 7B of *Jani*, they (the worker threads) are all part of the credit card payment processing system of FIG. 7B. *Jani* teaches away from the claimed element of sending a data transformation job to a local store if the local conditions are satisfied; else transforming the data at a central point, the enterprise node.

Because *Keller's* deficiencies are not rendered obvious in view of *Jani*, Applicant respectfully requests that the rejection to claim 1 be withdrawn.

The Office Action rejected claims 23-24 and 26-28 under USC 102(b) as being unpatentable over *Keller et al.* in view of *O'Neill et al.* (US Publication Number 2003/0069968 A1) and further in view of *Jani*.

Claims 23-24 and 26-28 have been canceled, thus mooted their rejection.

For the foregoing reasons, Applicant respectfully requests allowance of the pending claims.

Respectfully submitted,
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